

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

EDWARD BAGLEY, SR.

Defendant.

Case No. 10-00244-01-CR-W-DW

**MOTION OF DEFENDANT EDWARD BAGLEY, SR.
TO DECLARE CASE COMPLEX,
WITH SUGGESTIONS IN SUPPORT**

COMES NOW Edward Bagley, Sr., by and through his undersigned attorney, and moves the Court to declare this case complex pursuant to 18 U.S.C. Section 3006(A)(d)(3).

IN SUPPORT of this Motion, Defendant states:

1. On September 7, 2010 the Grand Jury sitting in the Western District of Missouri returned an eleven count indictment which charged all five defendants in Count One with Conspiracy in violation of 18 U.S.C. Section 271; Count Two with Sex Trafficking by Force, Fraud or Coercions, in violation of 18 U.S.C. Sections 1591, 1954 and 2; and Count Eleven with Use of an Interstate Facility to Facilitate Unlawful Activity, in violation of 18 U.S.C. Sections 1952(a) and 2. Defendant Bagley is also charged individually in multiple related counts.

2. Defense counsel is advised that there are thousands of pages of discovery. With the number of defendants and volume of discovery, this case will involve

significantly more attorney time than the average federal criminal case. It is anticipated that defense counsel will be required to expend an extraordinary amount of time reviewing discovery materials, conducting research, and investigating these matters in order to prepare for trial.

3. Trial is presently scheduled to begin in October 2010, but counsel anticipates that a request will be made to continue the trial until January 2010 or later.

4. It is respectfully suggested that this case should be determined to be “extended” pursuant to Section 2.22(B)(3) of the CJA Guidelines, and that it qualifies as “complex” pursuant to 18 U.S.C. Section 3006(A)(d)(3). Counsel therefore requests that the Court make these findings and authorize payment to all appointed defense counsel in excess of the maximum compensation amounts set forth in 18 U.S.C. Section 3006(d). Further, counsel requests that the submission of interim vouchers for legal services and expenses be authorized.

WHEREFORE, Defendant Edward Bagley prays that this Court declare this case complex pursuant to 18 U.S.C. Section 3006(A)(d)(3), and release counsel from the restrictions of the ordinary CJA compensation, as well as allow counsel to submit requests for interim payment for legal services and expenses.

Respectfully submitted,

s/s Susan L. Dill
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ATTORNEY FOR DEFENDANT
EDWARD BAGLEY, SR.

CERTIFICATE OF SERVICE

I hereby certify that on September 21, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to Assistant United States Attorney Cynthia Cordes as well as all defense counsel of record.

s/s Susan L. Dill
Susan L. Dill